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Before the
Federal Communications Commission
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of:

1998 Biennial Regulatory Review--)	
Amendment of Parts 2, 25, and 68 of the)	
Commission's Rules to Further Streamline)	
The Equipment Authorization Process for)	
Radio Frequency Equipment, Modify the)	GEN Docket No. 98-68
Equipment Authorization Process for)	
Telephone Terminal Equipment, Implement)	
Mutual Recognition Agreements and Begin)	
Implementation of the Global Mobile)	
Personal Communications by Satellite)	
(GMPCS) Arrangements)	

Comments of Rockwell International Corporation

Rockwell International Corporation (Rockwell), on behalf of its Rockwell Collins, Inc. subsidiary (Rockwell Collins), hereby submits Comments on the Federal Communications Commission's (the Commission's) Notice of Proposed Rule Making proposing to further streamline the Equipment Authorization process, implement Mutual Recognition Agreements and address GMPCS arrangements. As a major user of the Commission's Equipment Authorization process, an exporter of RF equipment and a manufacturer of GPS and satellite communications equipment, Rockwell Collins is directly impacted by the proposals in the Notice. Accordingly, Rockwell hereby submits the following comments:

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1) Rockwell supports the Commission's proposals to authorize Telecommunications Certification Bodies (TCBs) to certify RF equipment.

Rockwell supports the Commission's proposals to accredit and oversee TCBs capable of certifying equipment compliance with the relevant rules and regulations of the Commission and its MRA partners. In addition to using the National Institute of Standards and Technology (NIST) NAVCASE program to accredit TCBs, the Commission and its MRA partners should take all necessary steps to ensure that TCBs demonstrate and maintain consistent and detailed expertise and knowledge of the products and the rules and regulations covering products they seek to approve. Further, Rockwell concurs with the Commission's proposal that TCBs must demonstrate technical expertise and competence in all relevant testing and measurement procedures. The demonstration and maintenance of such knowledge and expertise by TCBs is essential in order to establish and maintain a credible certification program outside of the Commission and its MRA partners.

2) The Commission should not preclude the accreditation of manufacturers and the self-certification of equipment.

Rockwell urges the Commission not to preclude manufacturers of RF equipment from becoming accredited TCBs and certifying their own equipment. Rockwell believes that an accreditation and oversight process implemented for third party TCBs will be sufficient to ensure accurate and impartial self-certification by manufacturers. Further, most manufacturers with the motivation and resources to seek TCB accreditation through the NIST NAVCASE program likely will possess long experience in the implementation of government, ISO and other quality assurance programs designed to allow impartial judgement and action by employees. For instance, the Federal Aviation Administration pursuant to 14 CFR Parts 21 and 183 permits companies to have its employees certified as

“Designated Representatives” with the authority to examine, inspect and test aircraft equipment and manufacturing and engineering processes.

The benefits of self-certification, including the ability to flexibly schedule and allocate internal resources to certification and the ability to leverage existing investments in laboratories and test equipment will provide more than adequate incentives for manufacturers to ensure impartiality. When combined with a solid accreditation and oversight process, Rockwell believes these incentives will result in new internal processes that produce better equipment compliance than is produced under today’s external government processes.

3) The Commission and its MRA partners must ensure that TCBs and their equivalents provide grants of certification that are: 1) indistinguishable in quality from those provided by each government’s own processes; and 2) universally accepted by governments, customers and peoples around the world.

The Commission and its MRA partners cannot implement TCBs and the US/EC MRA in a half-hearted fashion. It should be the Commission’s goal in this proceeding to foster wide availability of universally-accepted certification services in the US. Rockwell believes that such services will reduce manufacturers’ time-to-market and increase US competitiveness in the global economy. Given the continued prospect of shrinking budgets and growing volumes of products requiring equipment authorization, the Commission must make efficient use of its resources. Although the Commission’s labs must continue to certify equipment in the near term, the Commission should seek to reallocate its resources in order to focus on the proper implementation and oversight of consistently high-quality TCB certification, thereby increasing equipment authorization capacity.

Rockwell was disturbed by the Commission's assertion in the Notice that "some manufacturers might prefer FCC certification for business reasons, since an approval issued by the U.S. Government may seem more legitimate to potential customers than one issued by another party." (Notice, para. 20) The Commission's contemplation of such a two tier perception of certifications undermines both the credibility of the Commission's proposed TCB program and the implementation of the US/EC MRA and future MRAs. Instead of re-affirming the usefulness of its current domestic equipment authorization processes, the Commission should take bold steps to legitimize TCBs domestically and internationally and lead its MRA partners by example.

4) Rockwell supports the Commission's interim adoption of the National Telecommunications and Information Agency's (NTIA's) proposed out-of-band emission levels for GMPCS terminals operating in the 1610 – 1626.5 MHz band.

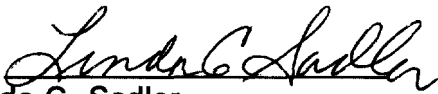
The NTIA's proposed out-of-band emissions limits on GMPCS terminals operating in the 1610 - 1626.5 MHz band are critical to the protection of Global Navigation Satellite System (GNSS) services, including the US GPS system, from harmful interference. The limits were developed by an RTCA special committee at the request of the Commission, the Federal Aviation Administration and the NTIA. As a manufacturer of both GPS and satellite communications equipment, Rockwell participated in the RTCA proceedings and supports the outcome. As the Notice indicates, the Commission plans to fully address the RTCA standard in another proceeding. Prudence dictates that the Commission use the RTCA standard in approving GMPCS terminals until the Commission has an opportunity to fully address the issue.

The 700 Hz bandwidth to which the Notice refers in paragraph 45 is associated with the signal properties of GPS and is not necessarily intended to be an actual

test measurement bandwidth. Rockwell believes that measurements should be made using a narrower bandwidth (e.g. 100 or 300 Hz) and translated by standard means to the 700 Hz specification bandwidth.

Respectfully Submitted,

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